

LEONARD G. HOROWITZ
and SHERRI KANE, pro se
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**UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII
ICA Nos. CAAP-16-0000162, CAAP-16-0000163, CAAP-18-0000584**

JASON HESTER
Plaintiff/Counterclaim
Defendant

vs.

LEONARD G. HOROWITZ
and SHERRI KANE,
Defendants

and

LEONARD G. HOROWITZ
and SHERRI KANE,
Counterclaimants

vs.

PAUL J. SULLA, JR., and
PAUL J. SULLA, JR., ATTORNEY
AT LAW, A LAW
CORPORATION;
HALAI HEIGHTS, LLC;
PATRICK SNIFFEN; BRADLEY
R. TAMM; HOWARD M.S. HU;
GARY VICTOR DUBIN;
STEPHEN D. WHITTAKER; and
JOHN S. CARROLL
Third Party Counterclaim
Defendants

) Civ. No.

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) **DECLARATION OF**
) **LEONARD G. HOROWITZ**
) **and SHERRI KANE**

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DECLARATION OF LEONARD G. HOROWITZ AND SHERRI KANE

We, LEONARD G. HOROWITZ AND SHERRI KANE, under pain of perjury of law, do hereby state and declare as follows:

- 1) We are individuals over the age of twenty-one (21) years; Horowitz is a resident of Las Vegas, NV and Kane is a resident of Torrance, CA.
- 2) We are not licensed to practice law before any court, but represent ourselves pro se in this federal action.
- 3) As of May 12, 2019, we co-defendants/counterclaimants in State case, Civ. 14-1-0304, and Horowitz a defendant in the related cases Civ. 05-1-0196 and 3CC17-1000407, realized there is no hope of obtaining any semblance of justice in the State of Hawaii court system, because of the widespread 'public corruption' we have experienced as victims, witnesses, investigative journalists, and whistleblowers dedicated to gaining justice not only for ourselves, but also for society.
- 4) Every week we hear from people across Hawaii who have suffered similarly as we have in the Hawaii court system. They reach out to us as investigative journalists in the hope of gaining justice, just as we reach out to you.
- 5) We have been heavily damaged, distressed, and irreparably harmed by attorney Paul J. Sulla, Jr. and his actions to steal our property and, in effect, our lives and professional careers. With his complicit agents detailed in this filing, Sulla's 'judicial racket,' drug trafficking, and money-laundering enterprise has deprived us of our civil rights to due process, right to our properties, and caused us to suffer unimaginable anguish.
- 6) Like many others damaged and distressed by Mr. Sulla with whom we regularly correspond, we have been irreparably harmed, far beyond financial and career losses from being targeted and maliciously prosecuted by Sulla's lust to own our very special spa property.
- 7) I, Sherri Kane, have suffered severe anxiety, heart pains and palpitations, serious high blood pressure, sleeplessness, and depression from what Mr. Sulla and the courts have done in his favor; and I, Dr. Leonard Horowitz, have suffered severe anxiety, anger, depression, gastrointestinal ailments, symptoms of ulcerative colitis, and sleeplessness from this fourteen-year-long battle to prevail against this injustice.
- 8) As pro se litigants having been financially and emotionally devastated by the malicious prosecutions and civil rights deprivations we have been forced to endure in both State and federal court cases opposing Mr. Sulla, we are not optimistic about this Removal to the U.S.

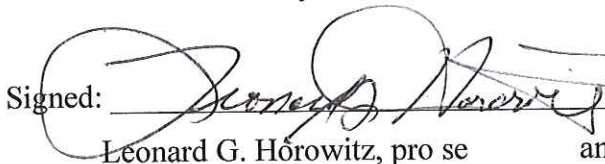
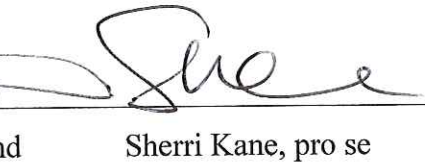
District Court wherein we have been repeatedly denied justice by Judge Seabright, Judge Faris, Judge Kobayashi, and Judge Mansfield, but not Judge Puglisi who we were sad to learn had retired.

- 9) We know that we cannot get a 'fair trial' in any Hawaii State Court given Mr. Sulla's powerful financial and political connections to the 'mob' that we know exists and as journalists now regularly cover; and
- 10) We believe that given our history of disappointments precluding justice in this U.S. District Court, we are justifiably concerned that existing bias here will also preclude justice for us.
- 11) We, therefore, make the following reasonable request: That whoever elects to adjudicate this case do some serious soul searching considering any and all bias that might preclude fairness in administering justice, and choose recusal rather than putting us through any more life-threatening abuse.
- 12) We have suffered enough, lost plenty, and aged terribly, under the burdens of public corruption and organized crime in this state.
- 13) So for all the above reasons we ask whoever accepts this case with clear conscience, please immediately engage us, in accordance with 42 U.S.C. § 1964(b), with the U.S. Attorney General for this district, so that proper proceedings may be instituted, *ab initio*.
- 14) We declare that all the statements we have made herein, and in the attached Notice of Removal, Complaint, and Motion to Show Cause, are true and correct to the best of our knowledge and belief; and
- 15) We declare that **Exhibit 1 thru 5** attached hereto, are true and correct copies of the original copies in our possession.

FURTHER DECLARANTS SAYETH NAUGHT

This Declaration is based upon our personal knowledge, and we are competent to testify as to the truth of the statements contained herein.

Dated: Honolulu Hawai'i May 31, 2019

Signed:  and 
Leonard G. Horowitz, pro se and Sherri Kane, pro se

*Jason Hester vs Leonard G. Horowitz et al; Civ. 05-1-0196, 14-1-0304, and 3CC17-1000407;
Declaration of Defendants/Counterclaimants for Notice of Removal and Motion to Show Cause.*